



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 29, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Enkei America, Inc. / 005-16814-00042

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

December 29, 2003

Executive Vice President
Enkei America, Inc;
Enkei Wheel Corporation
2900 West Inwood Drive
Columbus, IN 47201

Re: T005-16814-00042
First Administrative Amendment to
Part 70 005-7715-00042

Dear Mr. Vice President:

Enkei America, Inc; Enkei Wheel Corporation was issued a permit on January 7, 2003 for an aluminum foundry operation for the production and surface coating of aluminum wheels. A letter requesting an administrative review of the issued Part 70 operating permit was received on February 6, 2003. The request for administrative review was filed in the Office of Environmental Adjudication under Cause Number 03-A-J-3014. A joint stay agreement was entered on March 24, 2003. A joint amendment to the stay agreement was entered on June 12, 2003. On July 31, 2003, IDEM, OLC, OAQ and Enkei America, Inc; Enkei Wheel Corporation agreed to a stay of the language of Condition D.2.1 Secondary Metal Production of the issued Part 70 operating permit T005-7715-00042. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows. All deleted changes are indicated with ~~strikeout~~ (strikeout) and new language is indicated with bold type (**bold type**):

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Secondary Metal Production [326 IAC 2-2]

As of March 24, 2003, the effective date of the NESHAP for secondary aluminum production (40 CFR Part 63, Subpart RRR), ~~The Permittee~~ **the source** shall melt only “clean charge,” “customer returns,” or “internal scrap” **and shall not operate a “thermal chip dryer” as each is defined in materials that meet the definition of clean charge pursuant to 40 CFR 63.1503.** ~~Also, the Permittee shall not perform any demagging operations.~~ Violation of this condition would cause the source to be considered a secondary metal production facility ~~which is one of the 28 listed source categories for purposes of 40 CFR 63.1503.~~ Violation of this condition ~~would~~ **may** also constitute a violation of 40 CFR 52.21 and 326 IAC 2-2 (PSD).

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not applicable. Compliance with this condition is necessary to make the source a minor source under PSD.

These changes to the Part 70 operating permit T005-7715-00042 are intended to settle the appeal and are explained in the Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact James Farrell, at (800) 451-6027, press 0 and ask for James Farrell or extension 3-8396, or dial (317) 233-8396.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

JF

cc: File - Bartholomew County
U.S. EPA, Region V
Bartholomew County Health Department
Air Compliance Section Inspector - Vaughn Ison
Compliance Data Section - Lynetta Brown-Glover
Administrative and Development - Khira Barua
Technical Support and Modeling - Michele Boner
Office of Legal Counsel - April Schultheis

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Enkei America, Inc.; Enkei Wheel Corporation
2900 West Inwood Drive
Columbus, Indiana 47201**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T005-7715-00042	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: January 7, 2003 Expiration Date: January 7, 2008

First Administrative Amendment: 005-16184	Pages Affected: 32
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 29, 2003

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Secondary Metal Production [326 IAC 2-2]

As of March 24, 2003, the effective date of the NESHAP for secondary aluminum production (40 CFR Part 63, Subpart RRR), the source shall melt only "clean charge," "customer returns," or "internal scrap" and shall not operate a "thermal chip dryer" as each is defined in 40 CFR 63.1503. Violation of this condition would cause the source to be considered a secondary metal production facility for purposes of 40 CFR 63.1503. Violation of this condition may also constitute a violation of 40 CFR 52.21 and 326 IAC 2-2 (PSD).

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not applicable. Compliance with this condition is necessary to make the source a minor source under PSD.

D.2.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace #1 (MF1) shall not exceed 8.56 pounds per hour when operating at a process weight rate of 3.0 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace #2 (MF2) shall not exceed 8.94 pounds per hour when operating at a process weight rate of 3.2 tons per hour.
- (c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace H shall not exceed 4.07 pounds per hour when operating at a process weight rate of 0.99 tons per hour.
- (d) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace I shall not exceed 4.07 pounds per hour when operating at a process weight rate of 0.99 tons per hour.
- (e) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace A (MF-A) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (f) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace B (MF-B) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (g) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace C (MF-C) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (h) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Melt Furnace D (MF-D) shall not exceed 3.10 pounds per hour when operating at a process rate of 0.66 tons per hour.
- (i) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shotblaster identified as SB#1 shall not exceed 7.39 pounds per hour when operating at a process weight rate of 2.41 tons per hour.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Enkei America, Inc.; Enkei Wheel Corporation
Source Location:	2900 West Inwood Drive, Columbus, IN 47201
County:	Bartholomew
SIC Code:	3365
Operation Permit No.:	T005-7715-00042
Amendment No.:	T005-16814-00042
Part 70 Permit Reviewer:	NH/EVP
Modification Reviewer:	James Farrell

The Office of Air Quality (OAQ) has reviewed a Part 70 administrative review request from Enkei America, Inc.; Enkei Wheel Corporation relating to the operation of an aluminum foundry operation for the production and surface coating of aluminum wheels.

History

Enkei America, Inc.; Enkei Wheel Corporation was issued a Part 70 Operating Permit on January 7, 2003. A request for administrative review was received by the OAQ on February 6, 2003. The request for administrative review was filed in the Office of Environmental Adjudication under Cause Number 03-A-J-3014. Following are the issue of the administrative review and the responses as approved by IDEM, Office of legal council (OLC), OAQ and the source.

Comment 1:

Enkei America, Inc.; Enkei Wheel Corporation objected to the language of Section D.2.1 based on it does not accurately reflect the final rule for the National Standards for Hazardous Air Pollutants "NESHAP" for secondary Aluminum Production as published in the December 30, 2002, 67 Federal registrar 79808 "Final Rule". Enkei America, Inc.; Enkei Wheel Corporation requested a stay of Section D.2.1 due to the language of the final rule that became effective March 24, 2003. Also, Enkei America, Inc.; Enkei Wheel Corporation objected to the potential to be considered a "secondary metal production facility" as the term is used in 42 U. S.C. 7479(1) and 40 CFR 52.21(b)(1)(i)(A). Enkei America, Inc.; Enkei Wheel Corporation suggested the following changes to Section D.2.1

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Secondary Metal Production [326 IAC 2-2]

~~The Permittee shall melt only materials that meet the definition of clean charge pursuant to 40 CFR 63.1503. Also, the Permittee shall not perform any demagging operations. Violation of this condition would cause the source to be considered a secondary metal production facility which is one of the 28 listed source categories. Violation of this condition would constitute a violation of 40 CFR 52.21 and 326 IAC 2-2 (PSD).~~

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not

applicable. ~~Compliance with this condition is necessary to make the source a minor source under PSD.~~

The proposed new Section D.2.1 language is as follows:

D.2.1 Secondary Metal Production [236 IAC 2-2]

As of March 24, 2003, the effective date of the NESHAP for secondary aluminum production (40 CFR Part 63, Subpart RRR), the source shall melt only "clean charge," "customer returns," or "internal scrap" and shall not operate a "thermal chip dryer" as each is defined in 40 CFR 63.1503. Therefore, the requirements of 40 CFR Part 63, Subpart RRR are not applicable to this source because the source is not a "secondary aluminum production facility" as set forth in 40 CFR 63.1503.

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not applicable.

Response to comment 1:

Based upon appeal resolution meetings between IDEM, OLC, OAQ and Enkei America, Inc.; Enkei Wheel Corporation the following changes to Section D.2.1 have been agreed to as a resolution to this issue. Pursuant to the provisions of 2-7-11 the permit is being amended because the revision is a clarification of descriptive information where the revision will not trigger a new applicable requirement or violate a permit term. All deleted changes are indicated with ~~strikeout~~ and new language is indicated with **bold type**.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Secondary Metal Production [326 IAC 2-2]

As of March 24, 2003, the effective date of the NESHAP for secondary aluminum production (40 CFR Part 63, Subpart RRR), ~~The Permittee~~ **the source** shall melt only "clean charge," "customer returns," or "internal scrap" and shall not operate a "thermal chip dryer" as each is defined in materials that meet the definition of clean charge pursuant to 40 CFR 63.1503. ~~Also, the Permittee shall not perform any demagging operations. Violation of this condition would cause the source to be considered a secondary metal production facility which is one of the 28 listed source categories for purposes of 40 CFR 63.1503. Violation of this condition would may~~ **also** constitute a violation of 40 CFR 52.21 and 326 IAC 2-2 (PSD).

Compliance with this condition renders the requirements of 40 CFR 63, Subpart RRR not applicable. Compliance with this condition is necessary to make the source a minor source under PSD.

Recommendation

The staff recommends to the Commissioner that the Part 70 Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the review request and additional information submitted by the applicant.

Conclusion

The modification of this secondary aluminum foundry operation for the production and surface coating of aluminum wheels shall be subject to the modification to the Part 70 Permit No. T005-7715-00042 per the changes as modified in the **Part 70 Administrative Amendment**

Enkei America, Inc.; Enkei Wheel Corporation
Columbus, Indiana
Permit Reviewer: NH/EVP

First Administrative Amendment No.:T005-16814-00042
Amendment By: James Farrell

Page 3 of 2
T005-7715-00042

No. T005-16814-00042.